IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO WESTERN DIVISION

United States of America, : Case No. 3:18-MJ-5077-2

Plaintiff, : HON. JAMES R. KNEPP II

vs. : <u>MOTION FOR DETENTION</u>

HEARING

Barbara Wilson, et al.,

Defendants. :

Defendant Barbara Wilson respectfully moves the Court for a detention hearing, pursuant to 18 U.S.C. §3142(f), at which she will present a proposed combination of conditions of pretrial release which will reasonably assure both her appearance and the safety of the community. These proposed conditions have been submitted to the U.S. Pretrial Services and Probation Office, and specifically Officer Cheryce Burton, for review.

In light of further investigation needed by Pretrial Services (*i.e.*, completion of a home visit by S.D. Tex. Pretrial Services office), Ms. Wilson requests a detention hearing as soon *after* April 3, 2018 as is reasonably practicable.

Finally, Ms. Wilson respectfully requests leave to permit her proposed third-party custodian, Dr. Sabrina Norman, to testify at the upcoming detention hearing by video conference or telephone.

Respectfully submitted,

EASTMAN & SMITH LTD.

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PROOF OF SERVICE

This is to certify that a copy of the foregoing has been filed electronically this 30th day of March, 2018. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Adam S. Nightingale

Attorney for Defendant Barbara Wilson